

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA, :
Plaintiff, :
: :
vs. : Case No. 2:19-CR- 116
: :
SEAN HEISA, : CHIEF JUDGE MARBLEY
Defendant. : :

**UNOPPOSED MOTION TO CONTINUE
SENTENCING HEARING**

Now comes the defense counsel for defendant, Sean Heisa and requests the Court to continue his April 8, 2022 sentencing date to the next available date after April 15, 2022. AUSA Jessica Knight does not oppose this request.

Respectfully submitted,

DEBORAH L. WILLIAMS
FEDERAL PUBLIC DEFENDER

/s/ Stacey MacDonald
Stacey MacDonald (WA 35394)
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Attorney for Defendant
Sean Heisa

MEMORANDUM IN SUPPORT OF MOTION

Sean Heisa is currently serving a thirty-eight year sentence in State court for multiple counts of Robbery. Between 2017 and 2018, while incarcerated, Mr. Heisa wrote multiple letters threatening to injure individuals and mailed some of those letters to various government officials. He was interviewed by FBI agents in 2019 at prison, where he confessed to writing the letters.

On May 2, 2019, a federal grand jury returned an indictment charging Mr. Heisa with two counts of False Information and Hoaxes, in violation of 18 U.S.C. § 1038(a)(1) and 13 counts of Mailing Threatening Communications, in violation of 18 U.S.C. § 876 (c). On October 30, 2019, Mr. Heisa pleaded guilty to Counts 1, 4, 7 and 14 of the Indictment pursuant to a plea agreement. Each count carries a maximum sentence of five years for a total possible maximum sentence of twenty years. Mr. Heisa is currently held in custody in Indiana. Mr. Heisa previously filed a motion in October 2021 requesting to have his sentencing hearing in person. (ECF No. 70.)

Mr. Heisa's sentencing hearing has just been scheduled for April 8, 2022 for an in person hearing. (ECF No. 71). Defense counsel is scheduled for out of state leave from April 6th to April 15th, 2022 for a combination of vacation and legal training and has already purchased tickets and registered for training. Defense requests that the Court reset the sentencing hearing to the next available

sentencing date after April 15th, 2022. The Government has no objection to setting the sentencing hearing over to a date once defense counsel is back from leave.

WHEREFORE, for the reasons set forth above, defense counsel for Defendant Sean Heisa, respectfully requests this Court grant this motion to continue the current Sentencing Hearing date to the next available date after April 15, 2022.

Respectfully submitted,

DEBORAH L. WILLIAMS
FEDERAL PUBLIC DEFENDER

/s/ Stacey MacDonald

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Attorney for Defendant
Sean Heisa

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system. I certify that AUSA Jessica Knight is registered CM/ECF users and that service will be accomplished by the CM/ECF system.

/s/ Stacey MacDonald
Stacey MacDonald (WA 35394)
Assistant Federal Public Defender